

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 KATHERINE L. WAWRZYNIAK (CABN 252751)
ANDREW F. DAWSON (CABN 264421)
5 AMIE D. ROONEY (CABN 215324)
Assistant United States Attorneys

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102-3495
Telephone: (415) 436-7200
8 katherine.wawrzyniak@usdoj.gov
andrew.dawson@usdoj.gov
9 amie.rooney@usdoj.gov

10 Attorneys for United States of America

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

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|-------------------------------|--|
| 14 UNITED STATES OF AMERICA, |) NO. CR 19-377 WHA |
| 15 Plaintiff, |) |
| 16 v. |) STIPULATION TO EXCLUDE TIME FROM |
| 17 ANTHONY SCOTT LEVANDOWSKI, |) DECEMBER 3, 2019 TO JANUARY 25, 2021 AND |
| 18 Defendant. |) [PROPOSED] ORDER |
| 19 |) |

20
21 **STIPULATION**

22 The parties appeared for a hearing before the Honorable William Alsup on December 3, 2019.
23 The Court heard oral argument on Defendant's Motion for a Bill of Particulars (ECF 52, 55, 63), and the
24 parties discussed the status of discovery and the proposed scheduling order for the case. The Court
25 adjusted several pretrial deadlines in the Proposed Scheduling Order and set trial in this matter for
26 January 25, 2021. The parties agreed to return to court for an interim status conference on January 21,
27 2020, at 2:00 p.m.

1 In light of the volume of discovery and the complexity of the case, the parties stipulated, and the
2 Court ordered, that time between December 3, 2019 and January 25, 2021, be excluded for effective
3 preparation of counsel pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

4 The parties further stipulate, and ask the Court to find, that the requested continuance and
5 exclusion of time are in the interests of justice and outweigh the best interest of the public and the
6 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

7 The undersigned Assistant United States Attorney certifies that she has obtained approval from
8 counsel for the defendant to file this stipulation and proposed order.

9 IT IS SO STIPULATED.

10 DATED: December 4, 2019

/s/
KATHERINE L. WAWRZYNIAK
ANDREW F. DAWSON
AMIE D. ROONEY
Assistant United States Attorneys

13 DATED: December 4, 2019

/s/
MILES EHRLICH
ISMAIL RAMSEY
AMY E. CRAIG
RAMSEY & EHRLICH LLP
Counsel for Defendant Levandowski

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on December 3, 2019, this matter is continued until January 21, 2020, at 2:00 p.m. for an interim status conference. Trial is set for January 25, 2021 at 7:30 a.m. The time between December 3, 2019, and January 25, 2021, is excluded from the running of the speedy trial clock for effective preparation of counsel under 18 U.S.C. § 3161(h)(7)(B)(iv). The Court finds that the ends of justice served by excluding the time from December 3, 2019, to January 25, 2021, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO ORDERED.

DATED: _____

HONORABLE WILLIAM ALSUP
United States District Judge